

LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W.

SUITE 1200

WASHINGTON, D.C. 20036

(202) 857-3500

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ
ELIZABETH R. SACHS
GEORGE L. LYON, JR.
JOEL R. KASWELL
PAMELA L. GIST
DAVID A. LAFURIA
MARILYN SUCHECKI MENSE
B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA
STEVEN M. CHERNOFF

+ NOT ADMITTED IN D.C.

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ

—
OF COUNSEL
JOHN J. MCAVOY
J.K. HAGE III+
LEONARD S. KOLSKY+
HON. GERALD S. MCGOWAN

TELECOPIER
(202) 657-5747

<http://www.fcclaw.com>

WRITER'S DIRECT DIAL
(202) 828-8434
tslamowitz@fcclaw.com

August 1, 2003

Via Hand Delivery

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Wireless II, L.L.C.
E911 Interim Report

Dear Ms. Dortch:

Wireless II, LLC ("Wireless II") hereby files its E911 Interim Report regarding its wireless Enhanced 911 (E911) deployment and implementation status. Wireless II, as a Tier III carrier, who is employing a network-based technology, must be providing Phase II E911 service to 50 percent of its coverage area or population within six months of receiving a valid PSAP request; and 100 percent of their coverage area or population within eighteen months of receiving a valid PSAP request. 47 C.F.R. § 20.18(f).

Wireless II recognizes the public safety importance of Phase II E911 service. Wireless II's service area consists of rural parts of Nebraska.¹ It is in the process of removing its CDMA network and installing a GSM network. As set forth below, Wireless II provides its responses to the information requested by the Wireless Telecommunication Bureau in its Public Notice released June 30, 2003 (Public Notice, DA 03-2113, Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers).

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid).

¹ Control of Wireless II was recently transferred to NECO PCS, Inc., an affiliate of N.E. Colorado Cellular, Inc. (NECCI). NECO and NECCI currently provide wireless service in rural parts of Colorado.

Wireless II has received Phase I PSAP requests and deployed Phase I service in five of the eleven PSAPs within its service area. Wireless II has not received any Phase II PSAP requests.

2. The carrier's specific technology choice (i.e., network-based or handset-based solution, as well as the type of technology used).

As the Commission is aware, there are not any GSM compatible E911 handsets currently available. Therefore, at this time, Wireless II plans on deploying a network-based solution for its GSM network. Nonetheless, because of the rural nature of its service area, Wireless II anticipates that it will have difficulty in meeting the strict location accuracy standards set forth in Section 20.18(h)(1) of the Commission's rules for network-based carriers. In certain areas, Wireless II believes it will not be able to obtain the proper cell site triangulation to obtain accuracy data. Hence, Wireless II will work with the PSAPs regarding the location accuracy data that it will be able to achieve and, if necessary, will seek relief from the Commission of the location requirements. Wireless II will also face financial constraints in its deployment of a network-based solution. It will cost approximately \$20,000 per tower/site to install a Network Solution. Hence, because Wireless II is constructing in rural Nebraska, it will require about three-hundred (300) towers for an approximate cost of \$6 million. As Wireless II is currently operating at a cash flow deficit, it believes it will take six years to recoup the costs without state assistance.

3. Status on ordering and/or installing network equipment.

Since no PSAPs are Phase II capable at this time, Wireless II has not made the necessary hardware/software upgrades to its network.

4. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.

As stated above, no E911 handset solution exists for GSM networks. Hence, the only alternative solution for Wireless II at this time is a network-based solution, which will not be able to meet the Commission's strict location accuracy requirements.

4. The estimated date on which Phase II service will first be available in the carrier's network.

Wireless II estimates that Phase II service will first be available in its network by March, 2004. Triangulation accuracy and product availability will be two major hurdles to overcome in deployment of Phase II service by such a date. Additionally, manpower to implement Phase II deployment will be a major constraint as Wireless II's affiliate, NECC, will also be completing its end-to end digital coverage in its Colorado markets.

5. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

NA.

In the event you have any questions with respect to this matter, please contact the undersigned.

Sincerely,

David A. LaFuria
Todd Slamowitz

CERTIFICATE OF SERVICE

I, Steven McCord, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of August, 2003, delivered a copy of the foregoing Enhanced 911 Tier III Interim Report to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

David Solomon, Chief*
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7-C723
Washington, D.C. 20554

Blaise Scinto, Acting Chief*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C133
Washington, D.C. 20554

Jennifer Tomchin, Legal Advisor*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C400
Washington, D.C. 20554

Patrick Forster*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A104
Washington, D.C. 20554

Robert M. Gurss
Director of Legal and Government Affairs
APCO International
1725 DeSales Street, NW, Suite 808
Washington, D.C. 20036
Counsel for APCO

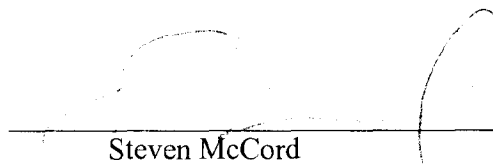
- 2 -

James R. Hobson
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Ave. N.W., Suite 1000
Washington, D.C. 20036
Counsel for NENA and NASNA

John Ramsey, Executive Director
APCO International, Inc. World Headquarters 351 N. Williamson Blvd.
Daytona Beach, FL 32114-1112

Jim Goerke, Interim Executive Director
NENA
422 Beecher Rd.
Columbus, OH 43230

Evelyn Bailey, Executive Director, NASNA
Vermont Enhanced 9-1-1 Board
94 State Street
Drawer 20
Montpelier, VT 05620-6501



Steven McCord

*via hand-delivery

AFFIDAVIT

County of Morgan

State of Colorado

) SS:
)

I, Larry Aisenbrey, having been first duly sworn, depose and state as follows:

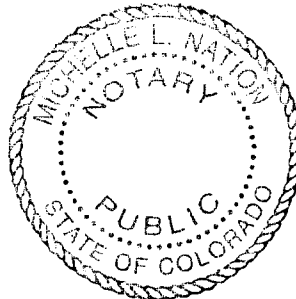
1. I am President NE Colorado Cellular
[title as officer or director] for [company name].
2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

[Signature]

Subscribed to and sworn to before me
this 31ST day of July, 2003.

[Signature]
Notary Public



My commission expires:
MY COMMISSION EXPIRES 05/20/2005